

Patrick A. Klingman (PK-3658)  
SHEPHERD, FINKELMAN, MILLER  
& SHAH, LLP  
65 Main Street  
Chester, CT 06412  
Telephone: (860) 526-1100  
Email: pklingman@sfmslaw.com

**Hearing Date: February 10, 2010**  
**Opposition Due By January 28, 2010**

**Attorneys for Movant**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:	:	Chapter 11
	:	
MOTORS LIQUIDATION COMPANY	:	Case No. 09-50026 (REG)
f/k/a GENERAL MOTORS	:	
CORPORATION	:	
	:	
Defendant.	:	Jointly Administered
	:	

**NOTICE OF MOTION OF PLAINTIFFS IN THE ACTION  
ENTITLED *O'CONNOR et al. v. GENERAL MOTORS CORPORATION*,  
FOR ENTRY OF AN ORDER GRANTING RELIEF FROM THE  
AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362(d)(1)**

PLEASE TAKE NOTICE that, pursuant to their Motion submitted herewith, the authorities cited therein, and the referenced Exhibit(s) attached thereto, Movants, William and Melody O'Connor ("**Movants**"), will move this Court, before the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Courtroom 621 at the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004, on **February 10, 2010, at 9:45 a.m.**, for an order modifying the automatic stay pursuant to Section 362(a) of Title 11 of the United States Code and Rule 4001 of the Federal Rules of Bankruptcy to enable **Movants** to proceed with their action, brought on

behalf of themselves and all others similarly situated, captioned *O'Connor et al. v. General Motors Corporation*, 2:07-cv-00892-FCD-GGH, and pending in the United States District Court for the Eastern District of California, for breach of express warranty and related claims against General Motors Corporation (“GM” or the “Debtor”).

Dated: January 11, 2010

By: /s/Patrick A. Klingman  
James E. Miller  
Patrick A. Klingman (PK-3658)  
Karen M. Leser  
SHEPHERD, FINKELMAN, MILLER  
& SHAH, LLP  
65 Main Street  
Chester, CT 06412  
Telephone: (860) 526-1100  
Email: jmiller@sfmslaw.com  
Email: pklingman@sfmslaw.com  
Email: kleser@sfmslaw.com

Mark F. Anderson  
ANDERSON, OGILVIE & BREWER LLP  
600 California Street, 18th Floor  
San Francisco, CA 94108  
Telephone: (415) 651-1951  
Email: mark@aoblawyers.com

James C. Shah  
Natalie Finkelman Bennett  
Nathan C. Zipperian  
SHEPHERD, FINKELMAN, MILLER  
& SHAH, LLP  
35 E. State Street  
Media, PA 19063  
Telephone: (610) 891-9880  
Email: jshah@sfmslaw.com  
Email: nfinkelman@sfmslaw.com  
Email: nzipperian@sfmslaw.com

Attorneys for Movants

**CERTIFICATE OF SERVICE**

I hereby certify that, on this 11<sup>th</sup> day of January, 2010, the foregoing Notice of Motion, together with supporting Motion and referenced Exhibit(s), attached thereto, were filed electronically with the United States Bankruptcy Court for the Southern District of New York via the ECF system. Courtesy copies of the foregoing were also sent to:

**Counsel to the Debtors:** Evan Lederman, Esq.  
Weil, Gotschal & Manges, LLP  
767 Fifth Avenue  
New York, NY 10153  
evan.lederman@weil.com

**Counsel to the Official Committee  
of Unsecured Creditors:** Kenneth H. Eckstein, Esq.  
Kramer Levin Naftalis & Frankel, LLP  
1177 Avenue of the Americas  
New York, NY 10036  
keckstein@kramerlevin.com

**Debtors:** General Motors Corporation  
Cadillac Building  
30009 Van Dyke Avenue  
Warren, MI 48090-9025  
c/o evan.lederman@weil.com

**United States Trustee:** Diana G. Adams, Esq.  
Office of the United States Trustee  
33 Whitehall Street, 21<sup>st</sup> Floor  
New York, NY 10004  
Fax: (212) 668-2256

/s/ Patrick A. Klingman  
Patrick A. Klingman (PK-3658)